

# KLARIS

Via ECF

USDC NY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 7/8/2025

July 2, 2025

Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:** *Abosch et al. v. Scholastic Entertainment Inc., et al. (No. 24-cv-08041)*

Dear Judge Torres:

This firm represents Plaintiffs Danomalous Productions, LLC, Danny Abosch and John Maclay (“Plaintiffs”), in the above captioned matter. Plaintiffs and Defendants Scholastic Inc., and Scholastic Entertainment Inc. (“Defendants”) respectfully submit this joint letter requesting a 60-day extension of the fact discovery deadline and all subsequent dates.

Pursuant to Your Honor’s Case Management Plan and Scheduling Order (“CMP”, ECF No. 33), the Parties deadline to complete fact discovery is August 4. Plaintiffs filed their initial Complaint on October 23, 2024 (ECF No. 7) and Amended Complaint on January 7, 2025x (ECF No. 28). Defendants filed a Motion to Dismiss eight out of the ten claims on March 3, 2025, which motion remains pending.

If your Honor grants this request, all fact discovery will be completed by **October 3, 2025**, and all expert discovery will be completed by **November 3, 2025** (45 days from completion of fact discovery, per the CMP). A complete proposed amended schedule is included below.

The parties have served and responded to written requests for production and interrogatories. Defendants have begun rolling document productions, and Plaintiffs anticipate doing so within the next 10 days. However, the volume of correspondence spanning the last ten years – the time period relevant to the claims in this case – is enormous. The Parties are diligently working through this substantial undertaking and anticipate completing document production substantially by the end of July, but will still require additional time to thoroughly review the produced documents and conduct fact depositions. A 60-day extension would allow the parties sufficient time to complete these tasks and ensure a comprehensive understanding of the complex fact patterns in this case before the next phase of litigation.

The parties have not previously requested any extensions of the case schedule or fact discovery. Both parties consent to the request.

Respectfully Submitted,

/s/Lacy H. Koonce III

Lacy H. Koonce, III  
Klaris Law PLLC  
161 Water Street, #904  
New York, NY 10038  
[Lance.koonce@klarislaw.com](mailto:Lance.koonce@klarislaw.com)  
(917) 612-5861

# KLARIS

Item	Current Date	Proposed Date
Completion of Fact Discovery	August 4, 2025	October 3, 2025
Completion of Depositions	August 4, 2025	October 3, 2025
Requests to Admit to be Served By	August 4, 2025	October 3, 2025
Expert Discovery Cutoff	September 18, 2025	November 3, 2025
Conduct Settlement Conference	August 18, 2025	October 17, 2025
Final Pretrial Submission Date	September 3, 2025	December 3, 2025
Deadline to Submit Proposed Finding of Facts and Conclusions of Law	September 3, 2025	December 3, 2025
Deadline to Submit Jury Instructions	September 3, 2025	December 3, 2025
Deadline to file Motions in Limine	After close of discovery and before Pretrial Submission Date	After close of discovery and before Pretrial Submission Date

GRANTED.

SO ORDERED.

Dated: July 7, 2025  
New York, New York




---

ANALISA TORRES  
United States District Judge